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Ex Parte

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

*Re: In the Matter of Amendment of Parts 1, 22, 24, 27, 74, 80, 90, 95, and 101 To
Establish Uniform License Renewal, Discontinuance of Operation, and Geographic
Partitioning and Spectrum Disaggregation Rules et al, WT-Docket No. 10-112*

Dear Ms. Dortch:

On October 1, 2010, Mike Roden (Executive Director – Public Policy), Robert Vitanza (General Attorney), Eric DeSilva (Wiley Rein LLP), and I met with Kathy Harris, Richard Arsenault, and David Goldman of the Wireless Telecommunications Bureau to discuss the above proceeding. During the meeting, AT&T expressed its support for the goal of simplifying the regulatory process for license renewal but expressed its concern with imposing new, vague build requirements at license renewal that might be independent from a licensee's already met build obligations. In response to Commission input that the NPRM was partly intended to address "gaming" with the rules by licensees in certain services, AT&T encouraged Commission staff to approach resolution of these problems on a service specific basis rather than by revising the renewal rules for all services. AT&T and Commission staff discussed the need for safe harbors for any new build requirements, starting with the safe harbors that the Commission has already recognized in its rules and Orders. Safe harbors give licensees' needed predictability, rather than uncertainty, by providing strong assurances that licensees will retain their licenses during the renewal process.

AT&T and FCC staff also discussed the proposed service discontinuation rules and the period that would constitute service discontinuation. Finally, AT&T suggested that we still wanted to explore the idea of re-aggregation and de-partitioning of licenses to reduce the administrative burden on these licenses. AT&T's discussions in the meeting were consistent with its comments filed in this proceeding.

Pursuant to the Commission's rules, a copy of this notice is being filed electronically in the above-referenced docket. If you require any additional information, please feel free to contact me.

Sincerely,

/s/ Joseph P. Marx
Assistant Vice President, AT&T Services Inc.

cc: Kathy Harris
Richard Arsenault
David Goldman